

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MOTION TO ACCEPT DEFENDANT'S AMENDED ANSWER OUT OF TIME.

JOHN DOE

Plaintiff,

Civil Action No. 2:21-CV-20706-MEF-ESK

v.

NOTICE OF MOTION

BAILA SEBROW

Defendant.

PLEASE TAKE NOTICE DEFENDANT NAMED S BAILA SEBROW
(Name of Moving Party)

will move before the Honorable Michael E. Farbiarz, U.S.D.J. on
OCTOBER 22, 2023

(Motion days are the 1st and 3rd Monday of each month)

for an Order TO ACCEPT DEFENDANT'S AMENDED ANSWER OUT OF TIME
(describe type of relief being sought)

In support of my motion, I will rely on the attached Certification and Letter Brief and proposed
Answer and Counter-Claim to Amended Complaint

IRA W. HELLER, ESQ.

Name

IRA HELLER LAW

1317 MORRIS AVENUE

UNION, NJ 07083

Address

Date: 9/18/2023

CERTIFICATION OF SERVICE

I, IRA W. HELLER, certify that a copy of my motion was served
(Name of Moving Party)

by EMAIL on 9/6/23 upon:
(Mail, Personal Service, etc.) (Date)

JOHN DOE

(Name of Opposing Party)

C/O DANIEL SZALKIEWICZ, ESQ.

Daniel Szalkiewicz & Associates, P.C.

23 West 73rd Street, Suite 102

New York, NY 10023

(Address of Opposing Party)

Name (Signature)

CC: Daniel Szalkiewicz, Esq.